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IBS

March/April, 1987
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UNIVERSITY AT CARBONDALE

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Underwriting and Donor Announcements

One of the regulatory areas of most interest and confustion to noncommercial stations involves FCC rules and policies governing on-air fundraising, underwriting grant acknowledgment announcements, and public service announcements.

Questions and confusion are to be expected, because the rules keep changing. The present sequence of changes started back in April, 1981 with the FCC's *Second Report and Order* in Docket 21136. These rules and policies, which became effective on June 25, 1981, established a "consideration received" standard which prohibited the broadest of announcements in exchange for "consideration" to the licensee, its principals, or employees. "Consideration" was defined in its broadcast legal sense "to denote anything of value given in exchange for something else of value". However, acknowledgments of contributions were permitted. The result was a much wider latitude for noncommercial stations who had previously been prohibited from airing announcements ". . . promoting the sale of a product or service".

The April, 1981 *Second Report and Order* also eliminated previous restrictions on frequency and scheduling of donor acknowledgment announcements, leaving both to the judgement of the stations. Permitted content was broadened to allow inclusion of a donor's address and a brief description of their products and/or services, in addition to their name, so long as the product/service description was neither qualitative nor promotional, but simply an identification.

Later that same year, Congress passed the *Public Broadcasting Amendments Act of 1981.* Sections 399A and 399B, in particular, made necessary some changes to the previous rules and policies adopted by the FCC. In July, 1982, the FCC adopted a *Memorandum Opinion and Order* in Docket No. 21136 which revised FCC rules and policies to conform to the provisions of Sections 399A and 399B. The result was three major changes:

1. Announcements for which "consideration" is received and which promote the goods, services or activities of non-profit entities *are* permissable. In other words, noncommercial educational stations are allowed to actually sell spot announcements to non-profit groups to promote their goods, services and activities!

2. Donor acknowledgments *may* include the donor's "logogram"—defined as identifying the donor's products or services in a value-neutral, generic sense—as well as the donor's location. This may not use qualitative, comparative nor promotional terms.

3. The scheduling of donor acknowledgment announcements may not "interrupt" regular programming.

Under continuing pressure to loosen these rules still further, in a March 28, 1984 *Memorandum Opinion and Order,* the Commission has allowed noncommercial stations to air underwriting and donor acknowledgment announcements which *also* include "trade names, product or service listings that aid in identifying the donor".

In part, the Commission explains its rationale for this change as follows:

"...We are persuaded that it is now advisable as a matter of policy and permissible as a matter of statutory authority to authorize public broadcast stations to expand the scope of their underwriting announcements. As we recognized in the Second Report, and as both the House Report and the TCAF report indicated, this mechanism offers significant potential benefits to public broadcasters in terms of improving the financial self-sufficiency of the service, yet, properly limited, does not threaten its underlying noncommercial nature. Accordingly, . . . hence-forth public broadcast stations will be permitted to use trade and brand names, as well as product and service listings, in their donor acknowledgments. We emphasize, however, that such announcements may not include qualitative or comparative language and this action is not to be construed as allowing advertisements, as defined in Section 399B, to be carried by public broadcasting stations. To summarize, donor acknowledgments utilized by public broadcasters may include (1) logo-grams or slogans which identify and do not promote, (2) location, (3) value neutral descriptions of a product line or service, (4) brand and trade names and product or service listings."

The FCC's 1982 *Memorandum Opinion and Order* also caused some confusion when the terms "stations" and "licencees" were sometimes used interchangeably. A particular problem arose when they said, ". . . public broadcasters are generally prohibited from engaging in fundraising on behalf of any entity *other than the licensee* where such activities substantially alter or suspend regular programming" (emphasis added). With this latest *Memorandum Opinion and Order* of March 28, 1984, the FCC has modified the appropriate language to clarify that such fundraising is allowed only for the station itself.

On April 11, 1986, the FCC released a Public Notice dealing with this subject area. Basically, it re-confirmed existing rules and policies, allowed for inclusion of donor phone numbers, prohibited children's program "host selling" and reminded stations broadcasting foreign language programs they are still responsible for their compliance with underwriting rules, guidelines and policies.

Here's a brief summary of the way things now stand:

Announcements for which "Consideration" is received and which promote goods, services, or activities of non Profit entities are now permissable

"Consideration" is a legal term broadly defined as "anything of value given in exchange for something else of value". As used here, it can be interpreted as anything of value provided to the station licensee, its staff, or employees, including the contribution of programming material and funds, goods and/or services used for programming, as well as "in-kind" contributions such as studio equipment, which free station funds for programming purposes.

Under the April, 1981 *Second Report and Order,* stations were not allowed to air any announcement was on behalf of a profit-making or a non-profit organization.

As of September 3, 1982, noncommercial stations *may* air promotional announcements on behalf of a non-profit organization in return for "consideration". In other words, a noncommercial educational station may "sell time" in the form of sport announcements to a non-profit organization. Remember, this broadcast of promotional announcements in return for "consideration" specifically applies *only* to non-profit organizations but *not* to political parties.

"Non-profit" entities or organizations may include a variety of groups, such as athletic, labor and agricultural associations or organizations; mutual insurance companies or associations, benevolent life insurance associations; mutual cooperative telephone companies; and state chartered credit unions—according to the Internal Revenue Service (IRS). Of course, there are a lot more kinds of non-profit entites as well, many of them probably now being provided with free public service announcements on your station.

This change also means that noncommercial educational stations may now broadcast announcements which promote program-related materials sold by non-profit organizations, including the station itself.

Some Thoughts About Noncommercial Broadcasting and the "Selling" of PSA's

Frankly, IBS is concerned about the erosion of the non-commercial nature of noncommercial broadcasting in general, and some stations in particular. With further loosening of the rules, noncommercial stations have been given their first opportunity as a whole to

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Underwriting

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actually sell time, aside from seeking underwriting grants and donations. The lines between commercial and noncommercial broadcasting are beginning to blur and this causes us concern for the future. Real questions may be raised about the role, purposes, and necessity for noncommercial broadcasting, particularly if our stations begin to sound more like amateur imitations of commercial outlets instead of doing what we do best: provide needed programming that's not necessarily available elsewhere locally.

The allowing of non-commercial stations to "sell" time for promotional announcements on behalf of non-profit entities has received varied reaction from stations themselves.

Some openly welcome this as they would any method which helps raise funds for the station in times of tighter budgets. Some may abuse this opportunity, and in the process alienate non-profit groups who have depended upon their free PSA's for publicity and sometimes their very existence. If overdone, they may also cause some understandable upset among an audience who suddenly finds itself bombarded with spot announcements.

There are other stations who negatively characterize anything to do with selling and deprive themselves of revenues that might be of some help to the station.

Of course, it's ironic that the rule changes allow our stations to accept "consideration" only from non-profit entities. These are the very groups who are already likely to be receiving our free PSA's. And, they're also the least likely to be able to afford to "buy" time for promotional announcements.

IBS urges noncommercial FM stations to consider all aspects of this situation carefully before formulating a policy for your station.

One "Middle Ground" might involve continuation of free PSA's on a rotational basis for non-profit groups. But if a group had a particularly special event or activity for which it wanted additional exposure, above and beyond the normal PSA rotation, then perhaps additional announcements could be made available for a fee.

Rates would have to be set carefully. Make them too high and no one will be able to afford them. Too low, and you'll have a glut of spots amounting to little revenue for the station. You may want to set a maximum number of such spots available per hour during your programming. Special programs might accomodate more or less spots, depending on their nature. A printed rate card could include rates, quantity discounts, coverage map, etc., but you might also include the station's policy on free PSA's. Remember, so far our discussion has been about promotional announcements for non-profit entities only. Donor/underwriting acknowledgments are another category more or less on their own.

Donor/Underwriting Acknowledgment Announcements

Donor and underwriting acknowledgments *may* include the donor's aural "logogram" as well as the donor's location, a value neutral description of a product line or service, and brand names, trade names, product or service listings that aid in identifying the donor.

"Logogram" (or Logo, as it is more commonly called) as used here is defined as identifying the donor's products or services in a value-neutral generic sense. That is, without qualitative, comparative or promotional terms.

The FCC allows stations to identify donors and/or underwriters not only by name, but also by address, and by their products and services so long as they are described without using qualitative or promotional terms. It's also O.K. to include a phone number as part of the address, but you can't urge people to call or stop by.

That description of the donor's products and/or services may include brand names or trade names that aid in identifying the donor. This can be particularly useful when the name of the underwriting company is not as familiar as the trade or brand name(s) of its products or services.

Aural (sound) logos may be used, so long as their contents do not include qualitative, promotional or comparative terms but they may use brand or trade names. For example, a donor might be identified with a short instrumental piece or sound effect which could be used as part of the donor identification announcement. But, such announcements should be brief—not 30 second jingles or other such efforts which might tend to overstep the boundaries of an identification.

Scheduling of Donor Acknowledgment Announcements

The 1981 *Second Report and Order* also lifted previous restrictions on when and how often donor announcements could be aired. No longer are stations limited to program donor announcements only at the beginning and end of the programs and once per hour during longer programs. No longer are general donor announcements permitted only at sign-on and sign-off and one per hour. With the lifting of these restrictions, stations can schedule such announcements when and as often as they see fit. The 1982 *Memorandum Opinion and Order* slightly lessened that freedom by saying that such announcements may not "interrupt" regular programming. In context, however, the interpretation of the term "interrupt" was rather narrowly stated with the result that station may still schedule donor acknowledgment announcements during natural breaks in their programming.

It is permissible to air donor acknowledgments at "the beginning and end of programs . . . between identifiable segments of a longer program" or, in the absence of identifiable segments, in programming during "station breaks", such that the flow of programming is not "unduly disrupted". That still seems to leave stations a lot of leeway in the scheduling of donor acknowledgments, it would seem reasonable that stations would tend to place them where they would not "unduly disrupt" the flow of programming with or without being told to do so. So, remember not to jump in with a donor acknowledgment while in the middle of a musical piece or in the middle of a speech or lecture, etc. Wait for an appropriate intermission or other natural break. But that's pretty much common sense, anyway.

In-Kind Donor Acknowledgments

Donors of goods and/or services instead of cash can be identified as with other donors above. Previous to the 1981 *Second Report and Order,* rules had restricted such identification of in-kind donors.

Credit Card use and On-Air Mention

During on-air fundraising campaigns, some stations have arranged with local banks for the use of credit cards, such as MasterCard or Visa for donor contributions. With the 1981 *Second Report and Order,* the FCC allowed use of credit cards for this purpose along with appropriate on-air mention and identification of the cards accepted. Because such arrangements often involve the bank reducing or eliminating their usual fee for such use, the identification announcement is considered acknowledgment of contributions (reduced or eliminated bank fee) and an informational announcement advising donors that specific cards are acceptable in making donations.

Promotion of "Transitory Events" - Concerts, Plays, Movies, Etc.

Such announcements for other than non-profit entities may be made, but *not* in return for consideration. If for a non-profit entity, consideration is permitted and announcements may mention price and urge attendance.

It is strongly suggested that the tone of the non-consideration PSA announcements be kept more informational in format rather than imitative of paid commercial spots on commercial stations. Abuse of this leeway could easily result in listener complaints and

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Public Files

By Jeff Tellis

What if someone walked into your station right now and asked the first person encountered for a look at your station's public file? What kind of a reaction would they get? A stunned look of disbelief? A scratching of the head and a request to repeat the question? A panic-stricken dash for the faculty advisor's office? An "I'm sorry, but I don't know what you're talking about"?

Or would your station staff person know exactly what the request meant and know exactly how to hand it?

At most stations, this situation simply doesn't happen very often, if at all. Because of this, some stations are not prepared for it. But you should be.

As 10-watt FM stations increase their power and as the FCC takes a closer look at non-commercial educational FM, the likelihood of a visit from the FCC is increased. The Commission is also proposing a "postcard renewal" procedure which could mean more thorough inspection visits an a random basis for the lucky stations chosen.

Members of the public are becoming more aware of the power of broadcast media and more willing to inject their input, more vocally expressing their opinions, and playing a more active role in broadcast station licensing and renewal procedures.

All of this means stations have to take a closer look at their own operations to assure FCC compliance. And, the public file is one of those murky areas where a number of stations simply haven't yet concentrated their efforts. Chances are, these stations have all or most of the materials required for inclusion within the public file, but they may not be all together in one place as they should. Also, station personnel may not be familiar with the requirements relating to the availability of material in the public file to members of the general public.

Most station managers have simply not taken the time to familiarize themselves with the applicable rules and therefore haven't passed this information on to their staff. They may not know where to look to find the appropriate rules, or upon finding them, they may not have fully understood some of the bureaucratic jargon in which some of the rules are written.

Our objective is to provide a basic overview of the requirements relating to content and availability in understandable English, and offer some suggestions on implementation and where to find out more.

Most of the information regarding public files for non-commercial educational FM stations can be found in Section 73.3527 of the FCC rules. (That's in the new section of Volume III where many of the rules applicable to different kinds of stations have been consolidated).

Here's a rundown of the major items that should be in your public file:

1. A copy of all FCC applications filed after May 13, 1965.

This includes all applications for which local public notice is required. Examples include your original construction permit application, any applications for facilities changes (including power increases), and applications for license renewals.

2. A copy of all other FCC applications which involve changes in program service, extension of time in which to complete construction, and assignment or transfer of control of the station.

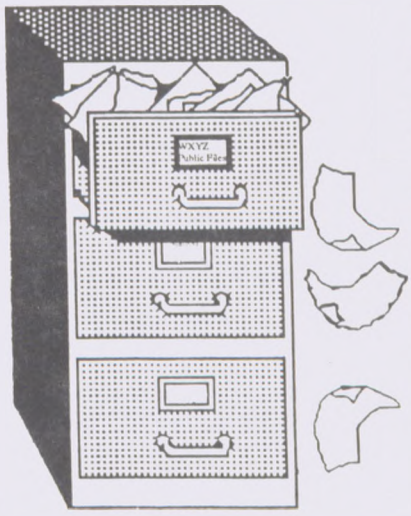
If any Petitions to Deny have been filed against an application, the public file must contain a statement that such a petition has been filed, and it must include the name and address of the person or group filing the petition.

3. A copy of the station's Ownership Reports (FCC form 323E).

Include any contracts which may relate to them. (You are required to file an Ownership Report with each license renewal, and within 30 days of any change in organization of the licensee, any change in officers or directors, or any transaction affecting the ownership, direct or indirect, or voting rights with respect to the licensee. For example, if your station is licensed to a Board of Trustees of your college, you must file a new Ownership Report within 30 days of the appointment of any new trustee, or the resignation or death of an existing trustee).

4. Political File.

A copy of all requests for broadcast time made by or on behalf of candidates for public office, with a notation indicating the station's response to each request, and whether or not it was granted. A record of all free time provided to or on behalf of such candidates must also be kept in the public file. These political requests and records must be retained for a period of two years.



5. A copy of each Annual Employment Report.

These must be filed by the licensee for the station. Even though most student-staffed stations have few, if any paid employees, this Annual Employment Report must be filed. It's usually sent to the licensee automatically by the FCC. Those with fewer than 5 employees (most of our stations) need complete only certain sections of the report before filing.

6. A copy of the "Public and Broadcasting: Revised Edition."

This is an all-purpose primer published by the FCC to explain the processes and procedures involved in broadcast applications, written for the public in an effort to help them provide their input in the form of ideas, support and opposition. If you don't have a copy you can find it in the Federal Register, September 5, 1974, beginning on page 32288. Many libraries subscribe to the Federal Register, as do many legal offices. Perhaps an easier way to get a copy of this booklet is to write and request it from the FCC's office of Consumer Assistance, 1919 M Street N.W., Washington, DC 20554 or call them at (202) 632-7000.

7. Names of Donors.

The names of donors who contribute funds, goods, or other consideration to support the station's programming, unless you've already entered those names in the station log.

8. Local Public Notice.

Statements certifying that the station has broadcast the required local public notice renewal pre-filing and post-filing announcements. The statement must be placed in the file within 7 days of the last announcement broadcast under this requirement and it must include the dates, times, and texts of these announcements.

9. Issues/Programs List (for stations of 100-watts ERP or more).

Every three months, stations must compile a list of at least 5 to 10 community issues addressed by the station's programming during the preceding three-month period. This list must include a brief narrative describing how each issue was treated. The program descriptions should include, but are not limited to, the time, date and length of each program, the title, and the type of programming in which the issue was treated (for example, public service announcements, a call-in program with a public official, etc.). This list must be placed in the station's public file by the 10th day following each

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Public Files

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calendar quarter (April 10, July 10, October 10, and January 10) and would include a record of issues and programs for the three preceding calendar months (for example, the list to be filed by April 10th would cover the period from January through March). These issues/programs lists must be kept in the station's public file for the entire license period.

NOTE: All Class D 10-watt stations and stations of any power whose programming is wholly "instructional" are exempt from the Issues/Programs list requirements.

10. Retention of Letters Received from the Public.

All written comments and suggestions received from the public regarding operation of the station must be kept in the public file, unless the letter writer has requested that the letter not be made public or when the licensee feels that it should be excluded from the public inspection because of the nature of its content, such as a defamatory or obscene letter. Letters must be kept in the public file for three years from the date on which they are received by the licensee.

LOCATION OF PUBLIC FILE

The rules require the public file to be physically maintained at the main studio of the station, or at any public place such as another office at the school, college, or university, or at a local attorney's office in the community in which the station is licensed. These files must be available for public inspection at any time during regular business hours. If not at the station, office personnel at the public file location should be instructed as to the procedures for access, content, retention and copying requirements.

PERIOD OF RETENTION

As mentioned, the political records required must be kept in the public file for a period of 2 years. Construction permit applications must be kept in the public file while they are still pending before the FCC or before the courts. Engineering material relating to a former mode of operation must be retained for 3 years from the time the station begins operation under a new or modified mode.

Most other material must be retained in the public file for a period of 6 years. Any material relating to a complaint, FCC investigation or other legal proceeding must be kept as long as that proceeding is still open. More specific details can be found in 73.3527 (g).

AVAILABILITY TO THE PUBLIC

The whole purpose of maintaining a public file is to make it available to the members of the public, should they desire to see it. This is in line with your obligations as a public trustee.

Any person can ask to see your public file during normal business hours, without an appointment. You are permitted to ask the person's name and address.

PHOTOCOPIES

The station must make any material available in the public file for photocopying upon a request made in person, but the requesting party must pay any reasonable costs involved. The station is not required to have a photocopying machine available on its premises, but can specify another location for such requests. Copies must be made available within a reasonable amount of time, no more than 7 days, unless there are no reproduction facilities available in the licensee's city of license. The station does not have to honor requests made by mail for copies, but may do so if it chooses.

SECURITY

Certainly, the station must safeguard its own files and should never allow materials from the public file to be given to a member of the public. Photocopies should be made by station personnel who assure that all original file documents are retained by the station.

Most stations rarely experience a member of the public walking in and asking to see their public file. However, the rules say you must be ready for just such a request from any member of the public, or from a member of the Commission staff on an inspection visit.

Make sure that your public file is kept up to date in its contents, and that older materials which no longer need to be retained are removed. Let every member of your staff know where the public file is, and how to handle any requests to see such material. The public file should be accessible during normal business hours by someone on duty during those times. Such access should be limited so that materials in the public file are not subject to disappearances. Members of the public utilizing their access privilege should be supervised to prevent any documents from being taken. The public file itself, while accessible, should also be secure to prevent unauthorized access and removal of any materials.

These are the basics. For details, it is recommended that you sit down and try to plow through section 73.327 and all of its cross-references. Meanwhile, the basics will help you get started in the job of getting in shape for that almost inevitable day when a member of the public and/or the FCC staff knocks on your door and asks to see your public file.•

Editor's Note: Just before the adjoining article on Public Files went to press, the FCC announced proposed changes to their rules relating to the issues-programs list for noncommercial educational stations. A summary of those proposed changes was published in the Federal Register, February 23, 1987. Reprints are available to IBS member-stations upon request to IBS, Box 592, Vails Gate, NY 12584. Here are some excerpts from that summary:

Summary: The Commission proposes to modify Section 73.3527 (a)(7) of the Commission's Rules relating to the noncommercial educational issues-programs list. The proposal would replace the existing quarterly list of 5 to 10 issues with a requirement that calls for a quarterly list of those programs that have provided the station's most significant treatment of community issues for the preceding three months. The proposed rule change will bring noncommercial rules into line with the Court of Appeals' concern with the previously required illustrative issues-programs list and conform noncommercial rules with those same requirements for commercial stations.

Dates: Comments must be filed on or before March 27, 1987, and reply comments on or before April 13, 1987.

Address: Federal Communications Commission, Washington, DC 20554.

For Further Information Contact: Barbara A. Kreisman, Policy and Rules Division, Mass Media Bureau, (202) 632-7792.

Supplementary Information: This is excerpted from a summary of the Commission's Notice of Proposed Rules Making in MM Docket No. 86-499, FCC 86-587, adopted December 29, 1986 and released on January 26, 1987.

The full text of this Commission decision is available for inspection and copying during normal business hours in the FCC Dockets Branch, (Room 230), 1919 M Street, NW., Washington, DC 20554. the complete text of this decision may also be purchased from the Commission's copy contractor, International Transcription Services, (202) 857-3800, 2100 M Street, NW., Suite 140, Washington, DC 20037.

Summary of Notice of Proposed Rule Making: In this proceeding, the Commission proposes to modify Section 73.3527 (a)(7) of the Commission's Rules relating to the noncommercial educational issues-programs list. The proposal would replace the present illustrative issues-programs list as was done for commercial stations. Under the revised rule, a noncommercial licensee is obliged, each quarter, to list those

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IBS Intercollegiate Broadcasting System

WHAT IS IBS?

The Intercollegiate Broadcasting System is a non-profit association of student-staffed radio stations based at schools, colleges and universities across the United States. IBS member-stations operate all sizes and types of facilities including closed-circuit, carrier-current, cable radio, and both 10-watt and higher-powered noncommercial, educational FM stations.

IBS was founded in 1940 by the originators of campus carrier-current radio. As stations have grown and developed, IBS has become increasingly involved with noncommercial FM and the complexities of the ever-changing FCC rules.

IBS STATION MEMBERSHIP

Perhaps one of the strongest reasons to consider IBS membership is that you no longer have to face your station's problems alone - you have somewhere to turn to where people understand. You'll be put in touch with people experienced in the kind of practical and often unique problems encountered in establishing, programming and operating a school or college-based student-staffed radio station. We can help with the kind of useful information you need, presented in informal, everyday language even inexperienced broadcasters and administrators can easily understand.

With changes continuing to come from the FCC, with budgetary limitations coming from schools and college administrations and student governments, with the changing and complex elements of technology, programming and the recording industry, and with the overall growth and development of school and college radio stations, it's more important than ever to work with people who understand your situation.

That's where we can help.

IBS membership is open to any broadcast group operated by or for the students of an institution of learning. This includes school, college and university operations. Groups who are in the planning stages for a new station are also welcome. For a membership application, or for an answer to your questions, write or call:

The Intercollegiate Broadcasting System
Box 592
Vails Gate, New York 12584

(914) 565-6710

Obscenity and the Law

By John Murphy
IBS Director, Station Relations and
General Manager, WHUS Radio

This material has been prepared to provide an overview of the topic with some background on federal law, including a listing of significant cases you may want to research further during your evaulation of policies presently in effect at your station.

1. Is your present station policy and procedure adequate to protect your license if listener complaints are filed with the FCC?

What would you do if one were filed next week? If your station does not currently have a ***written*** policy regarding the broadcast of controversial or "obscene" material, you are in a highly vulnerable position. If you wait to act on this matter until a complaint is filed, you are too late! The time for preventive measures is ***before*** any complaint is filed with the FCC, or with your licensee—(usually the Board of Trustees or other governing body in whose name your station license is issued).

An effective method for handling such complaints has many benefits for your station. Some of them are obvious. Some of the less obvious ones pertain to the quality of the relationship you have with your licensee. A defined policy and response mechanism demonstrates a profesional attitude to your licensee as well as to the FCC. Remember that complaints need not be filed with the Commission for your to face serious problems. A licensee made hostile or critical because of complaints about your programming may be a greater potential threat to your station's continued freedom than the FCC!

These warnings are not presented to upset you or to encourage a crisis atmosphere. But, perhaps they will alert you to the importance of formulating appropriate policies for your station.

2. Legal Cases for Research and Analysis

Following are some significant related cases within the last 20 to 25 years. Your university or college libraries—especially law libraries—will most likely have information on file about them. The reference numbers should help your libarian locate them. You are encouraged to examine the specifics of the various cases and apply any appropriate or relevant measures to prevent similar problems at your station. Look for any common circumstances as you relate each case to your particular situation.

Palmetto Broadcasting Company 33 FCC 250 (1962), WDKD Radio

Listeners complained about coarse, vulgar, suggestive language. The FCC denied station license renewal. That decision was affirmed. It was said a large amount of time was devoted to questionable material.

Pacifica Foundation 36 FCC 147 (1964)

This case involved complaints about programs on KPFK. Pacifica claimed the programs served the interests of the public. The FCC granted their license.

Eastern Educational Radio 24 FCC 2d 408 (1970), WUHY-FM

Complaints regarding expletives aired during an interview with Jerry Garcia. The station was fined $1,000 by the FCC. It paid the fine. The FCC said the language had no redeeming social value, was patently offensive. They also cited the elements of open reception and the pervasive nature of broadcasting.

Sonderling Broadcasting Corp 27 P & F Rad. Regs. 2d 285 (1973) WGLD-FM

Complaints about "Feminine Forum" discussion of personal sexual problems said to be "patently offensive" and indecent. The station was fined $2,000.

Yale Broadcasting Company v. FCC, 478 F. 2d 594 (1973) WYBC-FM

Commercial FM station based at Yale University. The situation involved "drug-oriented" lyrics. The FCC said the station should pre-screen records, monitor air content and respond to complaints.

Miller v. California, 413 U.S. 15

This was not a radio case, but has been used widely as a precedent in attempting to establish a definition of obscene materials as that which:

1. Exclusively appeals to prurient interests
2. Violates community standards
3. Has no serious value

Trustees of the University of Pennsylvania 57 FCC 2d 782 (1975) and 57 FCC 2d 793 (1976), WXPN-FM

Complaints involved the content of call-in program over a continued period of time during summer months. A large number of listener complaints went unanswered by the station leading to an FCC inquiry, which also went without station response. The licensee claimed it wasn't responsible since the problems involved community volunteers rather than student staff. FCC denied license renewal on issue of abdication of licensee control. The station license was later reinstated after the licensee promised to resolve the problem and would take appropriate steps to prevent a repeat of the incident.

FCC v. Pacifica Foundation 98 S. Ct. 3026 (1978) also 438 U.S. 776 (1978)—"The George Carlin Case"—WBAI

This case involved the airing of George Carlin's "Seven Words You Can't Say on Television" during an afternoon public affairs discussion on language.

Although a cautionary announcement was aired during the program, a father, driving in a car with his young son did not hear the announcement and complained about the son being exposed to this language. The FCC said the material was patently offensive and that federal law prohibited the broadcast of indecent language. It also cited problems of children's access to broadcasts, no warning of potentially offensive material was given, and that a scarcity of spectrum space made it necessary to establish standards.

The FCC's decision was overturned by the U.S. Court of Appeals but the Commission's position was reaffirmed by the US Supreme Court which stressed children's accessibility and that prior warning would not necessarily prevent a listener from hearing the material in question. This case introduced the concept of "channeling" material to time periods when children were less likely to be listening, made more stations aware of the use of disclaimers, and the importance of context.

A more recent situation involving KCSB, University of California/Santa Barbara, has not yet evolved in case law, but bears watching. In recent years, under the direction of Chairman Fowler, the FCC has taken steps in the direction away from being a watchdog over program content. In September, 1986, however, a local listener's complaint about material aired by KCSB featuring the Pork Dukes was forwarded to the FCC by the PMRC, the group consisting in large part of wives of prominent politicians and most noted for their efforts to put content warning labels on record albums.

FCC Mass Media Bureau Chief James McKinney wrote to the station's licensee, describing the complaint and asking them to respond within 30 days. The station says it already had a policy in effect which channeled such material to late night hours. That internal policy was apparently violated in this incident. We are concerned whether or not this sudden interest by the FCC signals any shift in position due to political or other pressures and the effect this may have on other college stations, particularly when their college adminstrators become aware of it.

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A View on Fund-Raising at the FM Educational Radio Station

by: Cathy Birdwell, WUVT Blaksburg, VA
reprinted from Volume 19

"Whenever there's a good idea, someone always mentions the budget."
- Charles M. Schultz - Peanuts

That quote defines a reality of the independent, educational, noncommercial radio station. It is no doubt a familiar thought, and has made for very interesting and innovative fund raising campaigns. Fund raising is a must, regardless of the existence of an income generating, commercial sister station.

The FM educational station should be building a give-and-take relationship with the community it serves. The listener is offered programming alternatives to the commercial fare, and in turn expects to be asked to contribute, especially if the on-air promotional phrases include such terms as "student owned and operated", "independent", "community oriented", and the obvious "listener supported".

There is no easy formula for planning a fund raising campaign. The guidelines and ideas that are presented all interact with each other, and to ignore one is to possibly not reach the desired goals.

The first decision to be made in the planning process is when to have the fund raising campaign. Be familiar with the economic patterns of the community - when do most workers get paid, when is there a dramatic decrease in population, what other organizations are engaging in activities (a popular concert, fraternity and sorority gatherings, and others). Choosing the "right" time is crucial to the amount of pledges generated.

Once a date is chosen, monetary goals need to be clearly defined. The goals can include a set dollar amount, the description and cost of specific equipment (to be bought with monies raised), a specific project that will be implemented, or other station needs. The promotion of the fund raising campaign can explain these defined goals along with the method employed to raise the money.

Which brings us the next point - what will you do to raise the money? Be creative, keeping in mind the known national fund raising campaign methods - the Jerry Lewis MD Telethon, the local PBS (TV), and NPR (radio) affiliates' auctions, and others. You can adapt a familiar method and increase the chances of the listener understanding what is happening. Benefit concerts work well too, but keep a tight rein on expenses. The showing of movies is another favorite. It's important to note that any "artsy" fund raising activities tend to appeal only to a small segment of the community.

You've determined your goal, planned how to generate the monies to reach the goal - now you need to check the station's staff for enough volunteers to work the campaign, and you need a promotion schedule. Fund raising events are a good time to get other staff members involved and more familiar with the station. Promotion is an absolute necessity, in order to get the listener prepared to part with his money. Remember that the listener lives on a budget, too, must also make financial plans, and in all likelihood will gladly part with a few dollars.

I'd like to share with you the specifics of an annual fund raising campaign employed by WUVT.

This campaign is held during the Fall, when students generally have more money, and as close to the beginning of the month as possible - when University employees get paid.

The campaign called the "Radiothon" is an over-the-air auction of donated merchandise. It takes approximately one month to collect enough auctionables. The business community is divided into sections and a staff member is assigned a section, and instructed to gather merchandise. The recent changes in the FCC's Rules and Regulations concerning the identification of donors can be of great help in collecting auctionables. Under the old rule, the donor could be identfied by name only. The changes allow not only the mention of name, but also of the place of business and product line. This increased recognition can be used as an "incentive" for donating merchandise. Once the community has been covered, the dollar value of the merchandise donated can be used to guage the probability of reaching the desired goal.

Our first year of the "Radiothon" raised $1,500.00, the second year raised $2,500.00 and the third $1,100.00. We accounted for the varying amounts in the following manner: That first year "Radiothon" was new, unfamiliar to WUVT listeners and also to the staff who had administration difficulties. The second year, most of the administrative bugs had been worked out and the community knew what to expect. The

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Obscenity

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adminstrators become aware of it.

In a related incident, Pacifica's KPFK was sent a similar letter by the FCC's McKinney in response to listener complaints involving homosexual programming.

3. Historical Review—Conflicting Federal Statues

In order to understand why the communications industry is regulated, one must briefly look to its history. Before 1927, the allocation of broadcast frequencies was left entirely to the private sector. Since there were a finite number of frequencies for a virtually unlimited number of broadcasters, (or potential broadcasters), the result was mass confusion. There were simply too many voices competing to be heard and not enough spectrum space to accommodate them.

Congress then passed the Radio Act of 1927, which established the Federal Radio Commission (FRC) to allocate frequencies, among other things. The Radio Act later begot the more comprehensive Communications Act of 1934 which still forms the foundation of telecommunications regulation today.

The administrative body created by Congress to enforce the Communications Act of 1934 is the Federal Communications Commission. The FCC is composed of five members appointed by the President. Under the provisions of the Act, the FCC is granted power both to supervise rates and services, and to regulate broadcast licenses.

Although Congress, by necessity, is permitted to regulate broadcasters, this power may not infringe upon First Amendment rights. The Supreme Court pointed out in *Red Lion Broadcasting Co. vs. FCC, 395 U.S. 376 (1968)* that:

"The people as a whole retain their interest in free speech by radio and their collective right to have the medium function consistently with the ends and purposes of the First Amendment."

The battle to keep pornography off the airwaves pits the First Amendment against the power of Congress to regulate under the Communications Act of 1934. The federal power to regulate the program content of radio (and TV) resides in three *conflicting* statutes.

First, the Communications Act empowers the FCC to regulate broadcasters in the "public interest." Section 303 of the Act empowers the FCC to regulate the communications industry to serve the "public convenience, interest, or necessity." Those broadcasters who do not serve the "public interest" may have their licenses to operate suspended or revoked by the FCC—although this has rarely happened.

The second is a criminal statue which prohibits the broadcast of indecent or obscene language. Section 1464 of the U.S. Criminal Code reads:

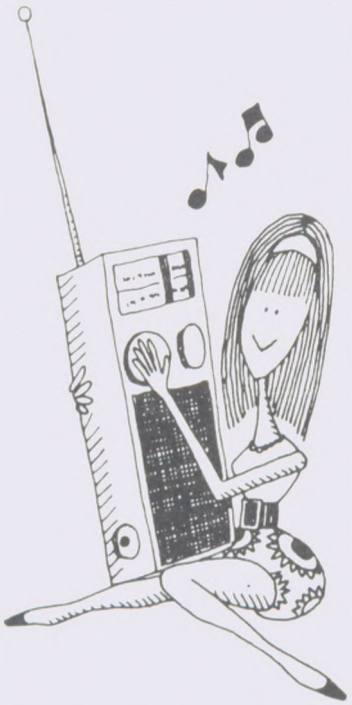
"Whoever utters any obscene, indecent or profane language by means of radio communications shall be fined not more than $10,000 or imprisoned for not more than two years or both."

Finally, the FCC is prohibited by the Communications Act from exercising censorship over broadcasters. Section 326 of the Act reads:

"Nothing in this chapter shall be understood or construed to give the Commission the power of censorship over the radio communications or signals transmitted by any radio station, and no regulation or condition shall be promulgated or fixed by the Commission which shall interfere with the right of free speech by means of radio communication."

These three statutes certainly appear to be in conflict with each other. On the one hand, it seems that stations which do not serve the public interest may not broadcast. Yet, on the other hand, this would seem to be censorship that would violate freedom of speech. Furthermore, Section 1464 prohibits the broadcast of indecent and obscene speech—which would also seem to amount to censorship and violate broadcasters' freedom of speech.

It would also appear that Section 1464 is in conflict with the Miller decision (1973) which requires that only material which is judged obscene may be prohibited. Those who wish to keep what they consider to be pronography off the airwaves claim that pronography is both indecent and not in the public interest.



Those who wish to permit the broadcast of such controversial material claim that to do otherwise would amount to censorship in violation of the First Amendment. The questions raised by the conflicting sections were partially answered in a famous Supreme Court decision in 1978—the Pacifica case regarding the broadcast of material by George Carlin.

4. The 1978 Pacifica Foundation (WBAI) George Carlin Case

The 1978 Pacifica Supreme Court case (FCC v. Pacifica, 438 U.S. 776) contains some of the more significant policy statements by the FCC about acceptable guidelines for the broadcast of potentially controversial material. It was with this case that the FCC introduced the concept of "channeling". They encouraged broadcasters to take into consideration the potential exposure to children of such material and therefore to present it at times of the day—(more likely evening or night)—when they are least likely to be listening. Thus the late-night hours are commonly used in setting station guidelines in order to minimize the potential risks of exposure to children.

Two sections of the Supreme Court ruling in this case provide clear positions from both sides of this debate. First, a quote from the majority statement by Justice Stevens addresses the intrusive nature of the electronic media:

"Patently offensive, indecent material presented over the airwaves confronts the citizen not only in public but in the privacy of the home, where the individuals' right to be let alone plainly outweighs the First Amendment rights of an intruder."

In dissent, Justice Brennan expressed concern for the First Amendment rights of both the broadcast media and the people who want to hear such programs. He pointed out it is the listener who decides whether or not to invite the broadcast into his/her home. Brennan stated:

"Whatever the minimal discomfort suffered by a listener who inadvertently tunes into a program he finds offensive during the brief interval before he can simply extend his arm and switch stations or flick the "off" button, it is surely worth the candle to preserve the broadcaster's right to send, and the right of those interested to receive, a message entitled to full First Amendment protection."

If you consider both of these opinions in the discussions at your station, you may arrive at some level of balance between these points of reference.

5. Guidelines for your own Station Policies

When you get down to essentials, there are 3 major components that should be included, in some way, in whatever

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Engineering Miscellany

By Ludwell Sibley

The following is a collection of topics that may be useful to engineers at college stations. For further information, readers are welcome to contact the author on (201) 782-4894 (evenings or weekends) or at 44 E. Main Street, Flemington, NJ 08822.

Getting the FCC Rules

Ever since the Government Printing Office converted its production of the FCC rules from loose-leaf form with periodic updates to a yearly complete reprint, there has been some confusion as to how to order copies of the latest version. In reality, the process is quite simple. Each year, around March, the GPO reissues four six-by-nine inch paper-back volumes of the rules, revised to the current as of October 1 of the previous year. The volumes are titled "Code of Federal Regulations - Title 47".

The first provides Parts 0 through 19 of the rules; for our purposes, that includes Part 1 (Commission Organization), Part 2 (Frequency Allocations), Part 13 (Operator Licensing), Part 15 (the "Radio Frequency Devises" or carrier-current radiation limits), and Part 17 (the Tower Regulations). The second volume provides Parts 20 to 69, which is the "common carrier"or telephone rules. This material is of little interest to broadcasters except for possibly the telephone equipment registration program in Part 68. The third volume, Parts 70-79, is the real payload for us. It includes Part 73, the radio and television broadcast rules; Part 74, the broadcast auxiliary regulations (studio-to-transmitter links and remote-pickup systems); and Part 76, the cable TV rules of some interest to cable FM stations. The final volume covers Parts "80 to end". This set covers mainly non-broadcast radio communication services (ship, mobile, private microwave), including the Citizens' Band rules in Part 95 and the amateur regulation in Part 97; again, of little interest for broadcast purposes.

Ordering the volumes you need is simplicity itself: You dial up the GPO order desk on (202) 783-3238, ask for "47 CFR Parts 70-79" and any other volumes that you need, and provide a MasterCard or Visa number. Delivery takes only a couple of weeks. You can order by mail, writing to the Superintendent of Documents, US Government Printing Office, Washington, DC 20402.

IBS also makes available the CFR Parts 70-79 along with a checklist. Notice will be sent out when the latest update - revised as of October 1986 - is available.

By the time you read this, the 1986 rules should be ready. When the arrive, be sure to discard any outdated copies at your station or mark them "obsolete". Since the thrust of the Commission's actions in recent years has been to simplify the rules and remove requirements, following old rules won't necessarily get you in trouble, but good management implies knowing what the current requirements are.

If station management feels that updates on a more frequent basis than yearly are needed, commercial firms (the Rules Service Company or Pike and Fischer, both in Washington) can provide ongoing coverage. But few stations feel the need for such precision. Watching the trade press or IBS releases is normally sufficient.

A Possible Glimpse Into Your Stations History

The staff at the typical high school or college station turns over about every three years. Events of two years ago are ancient history, except as seen by long-lived parties like some faculty advisors or instructors. In case your station's history is a bit foggy, here'e a possibility. For many years, the IBS engineering department kept on hand a "facilities questionnaire" covering each member station. While such detail eventually became unnecessary as the college radio industry matured, the archives are still available. We have 21 studio layouts and airchain drawings from the Forties, a few from the Fifties, and about 400 from later times. If you'd like to see if we have some history on your station, please contact the writer and a search will be arranged. If your station used a different call sign or the school changed names, please advise. If we have a file on your operation, you may be surprised at the results.

Got a Spare Crystal?

We had a little false alarm at the writer's station a few weeks ago: according to the monitor, the transmitter was off frequency. The trouble turned out to be elsewhere, but it brought the following to mind.

You FM operators: Do you have a spare crystal on hand? The one unique part in the station, the one whose failure will truly disrupt normal operation is the crystal. Sure, if it fails, maybe you can open up the phase-locked loop in the exciter and struggle along with a frequency measurement every couple of hours. Maybe.

Crystals aren't so critical in AM radio. If the "rock" goes out in a station on, say 1490 kHz, any other station on 1490 can probably loan a spare unit. But the frequency control circuits in FM exciters differ widely from one model to another and it's unlikely that a neighboring station on your frequency can back you up unless its exciter is a similar model. Manufacturers don't necessarily stock spares for models that they have discontinued.

While reliable, these parts do fail. In one case, a chipped crystal - during finals week, of all possible clumsy times - put a station 2 ½ channels off frequency. The station was lucky; the manufacturer was right across town and the part was on the shelf. But in general, fifty dollars invested in a spare will bring a lot of peace of mind.

Technical References on Carrier-Current Transmission

Engineering information on carrier-current transmission has always been a specialty item with limited availability. IBS has put out handbooks and booklets from time to time. So have equipment manufacturers. We now have an update in the works covering IBS material on carrier-current system design. If you need an advance copy, you are welcome to contact the writer and ask for the Carrier-Current Package.

There is some material in the regular published domain, notably the article "Design and Installation of Limited-Area AM Broadcast Systems" in the IEEE Transactions on Broadcasting (Vol. BC-27, No. 3, September, 1981, pp. 60-63). This is a general primer on carrier current systems. A computer search for other published references run about 18 months ago turned up nothing else.

For the fundamentals-minded, however, at least two good engineering studies appeared last year. "Attenuation of Communication Signals on Residential and Commercial Intrabuilding Power Distribution Circuts" (M.H.L. Chen et al., IEEE Transactions on Electromagnetic Compatibility, Vol. EMC-28, No. 4, November, 1986, pp. 220-230) reports on a series of transmission-loss measurements and crossmodulation hum tests in small and large buildings at frequencies between 20 and 240 kHz. Although the tests were made well below broadcast frequencies, they confirm things that we've always known: the signal level at a given point can vary widely (20dB or more) from one time of the day to another; there are receiving locations where the signal strength depends critically on frequency; in large buildings, doubling the frequency reduces the received signal by

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Radio Training Programs - A Key to Your Survival

By John Murphy, General Manager, WHUS Radio
Director of Station Relations, IBS

It's a fairly safe assumption that most of the people who become interested in joining your station's staff have had little or no prior experience at a radio station. Yet, all too often without our even thinking about it, they are expected to somehow learn what to do and how to do it.

The lack of a decent training program can (and does) lead to a lot of problems for staff people and for the station, if not immediately, then almost certainly later on during the year. A variety of problems can be traced to one or more people simply not knowing how or why to do or not do something.

Because of wide differences in station sizes, facilities, resources, and situations, there's no one model of training program that will work equally well for every station. We can help describe what kinds of things to cover in your training program, but it's up to you to design one to fit your station.

The important thing is to establish a training program if you don't already have one, or take a hard look at the one you have now. You can't expect new (and old) staff to know what needs to be known without some help along the way. That's what a good training program is all about.

This article introduces and explains several models for establishing or evaluating a training program at your station. Station management should periodically evaluate all training policies and modify them as changing resources and circumstances may require.

One of the most important requirements for the successful operation of your station is *Continuity*. A well organized and consistent program of training for new members of your staff is crucial to maintaining the quality of your present operations. It is also an excellent way to prevent management problems *BEFORE* they arise.

This material has been designed to be flexible, so that it can be useful to you regardless of the size or resources of your individual stations.

Benefits of a Systematic Training Process

Improved Licensee Relations - In this age of media deregulation, it is more important than ever to let your station licensee know that you are aware of whatever FCC rules are left. Any training program should instruct new staff on current FCC rules and you should update your own knowledge periodically.

Inform the licensee about your training program. This will add to your credibility as a responsibly managed organization. A positive relationship with your licensee is always in your mutual interest and is the best way to keep whatever freedom you now have.

Increased Competence of Staff - This is an obvious point. However, training is often not given the priority it deserves by station management. It is amazing to me that some stations still take the lazy approach and "throw people on the air". When you do this, you risk losing listeners and their loyalty. Respect the intelligence of your listeners and use your training program to provide maximum, not just minimum preparation.

Well-trained staff will feel and sound more confident about themselves. They will have a broader knowledge of the station as a whole, not just their own department of interest. Station morale and team spirit will improve. A large percentage of personnel-management problems can be avoided (or minimized) by keeping all staff sensitive to each other and aware of how each person's work interacts with everyone else's. Uniform training also makes it easier to integrate new people into your staff.

Station Air Sound Will Improve - Many of our stations broadcast an eclectic range of entertainment and informational programs. To hold listeners and to keep them coming back, the basic quality and competency of your air sound must be consistent. As you change staff airshifts, from show to show and day to day, it is crucial to keep the overall sound of mic breaks as even and uniform as possible. Consistent training methods produce consistent mic breaks and segues between programs.

This consistency is not intended to produce just another crop of homogeneous (and replaceable) "announcer clones". Anyone who seriously listens to most commercial radio today will notice an alarming increase in this new form of life. Creating a personality or "format" for your station requires more than basic skills - it demands a team effort by all involved to project a unified sound and image to the listener.

Programmers should also be given the freedom to develop their own unique relationship with your audience. They should be trained to be technically and aesthetically competent while developing their style. Give them that chance now - they will rarely get it a second time. Once people have found themselves, so to speak, and developed a level of competence on the air, they will be more capable of adapting to any format guidelines. They will then be ready for your prime airshifts.

Minimizes Turnover Problems

Turnover is probably *The* problem for college radio. It probably always will be, because the staff at our stations is always changing. People join your station staff, spend a year or two or three and leave. In such an environment, training is obviously the only way to survive. Managers need to be trained as well, and the new staff member you invest in now may become a better manager later.

Make training an ongoing process. Conducting two of three programs of training a year provides a regular supply of new staff members. Recruitment

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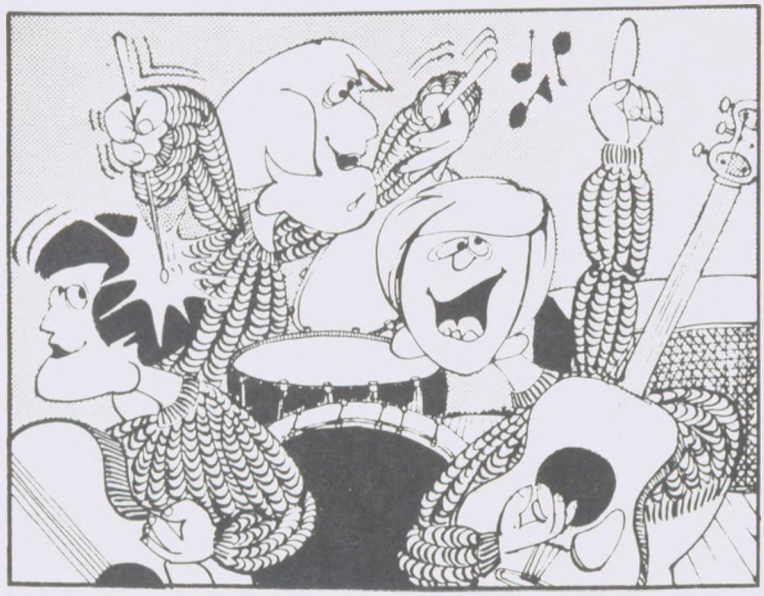

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Charlie Jones

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800-328-3771

or in Minnesota call (612) 887-5550.

Public File

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programs aired during the preceding quarter which, in the licensee's judgment, provided the station's most significant treatment of issues of concern to the broadcaster's community. This program record keeping obligation accommodates the Court of Appeals concern for the proper functioning of the petition to deny process and the FCC's own information needs. This requirement has been narrowly tailored to meet our regulatory needs and, therefore, is minimally burdensome to licensees. The proposed rule change will conform noncommercial rules with those same requirements for commercial stations.

Appendix A -

Initial Regulatory Flexibility Analysis

I. Reason for Action

. . . The modification of these rules was initiated in response to concern expressed by the United States court of Appeals that an illustrative issues-programs list did not further the Commission's stated regulatory goal of relying on effective public participation in the license renewal process.

. . .

IV. Description, Potential Impact, and Number of Small Facilities Affected

This item would have minimal impact on small noncommercial educational stations for the "significant treatment" alternative has been narrowly tailored to meet the FCC's regulatory needs and, therefore, is minimally burdensome to licensees. In the past, these stations have been required to place in their public files on a quarterly basis a list of from 5 to 10 community issues and the programming broadcast during the preceding three months that was responsive to the community issues. In response to directives from the Court of Appeals, the Commission is proposing herein to replace the existing illustrative issues-programs list with one that sets forth the significant programming broadcast in response to community issues listed. •

Underwriting

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later imposition of restrictions because of at least the appearance of "overcommercialization" by stations.

Be sure not to tie-in any of the non-consideration PSA announcements with a requirement for a "donation" of funds, goods, and/or services. That would be in clear violation of the "consideration received" standard for other than non-profit entities. If you decide to air listings of which artists are appearing at which local clubs, for example, make sure you offer an opportunity for all clubs to receive the same kind of listing on an equal basis, and without any requirement that they provide the station with free tickets or other donation in order to get the PSA bulletin board announcements.

Ticket giveaways are permitted. But it is strongly suggested that you keep any such giveaways separated as much as you can in time from any non-consideration PSA announcements for the same event. This avoids any appearance that the PSA was provided in return for the tickets except for non-profit entitles, where such consideration is permitted.

To control this area, make sure your station people are told not to personally accept free tickets or other consideration in return for the airing of any PSA.

Remote Broadcasts from Commercial Locations

These kinds of broadcasts are permitted if no consideration is received from the commercial store, club, etc. Each situation must be decided upon its own merits. The FCC "will not view the mere permission of an establishment to broadcast an event as consideration". "However, obvious promotion of an event and/or establishment could raise factual questions as to the agreement between the establishment and the licensee. Making an establishment available in exchange for on-air promotion beyond that reasonably related to the production of the program would constitute consideration, and would be prohibited. We stress that it is the announcement for consideration that invokes the rule, not the event itself."

This allows stations a lot of leeway in doing "live" remote broadcasts, but not in return for consideration from the location owner or lessor, unless it is a non-profit entity.

The Commission's language is obviously aimed at cautioning stations against over-promotion of the location in connection with any event announcements.

Make sure you also don't require a store or club to make a "donation" to the station before you'll do any broadcasts from their location.

In doing a "live" club broadcast, you can apparently urge attendance if you feel it would be in the public interest in your judgment. But, in doing a remote from a shopping mall, for example, you should not air announcements of store sales specials.

Promotion of Educational Courses, Government Booklets, etc.

Under the 1982 *Memorandum Opinion and Order,* such announcements are permitted on behalf of a non-profit entity with or without consideration. For other than a non-profit entity, no consideration is allowed, and the announcements would be aired only if in the licencee's judgment, the announcements serve the public interest.

Again, use reasonable judgment. Equal opportunities should be allowed for both free PSA's and "consideration received" announcements for all local area non-profit schools and colleges, not just your own.

Consumer interest and other government booklets and publications may be offered in announcements, with or without consideration involved, if you so decide. Such announcements may contain mention of price.

Prize Giveaways

These are usually used by non-commercial stations as either a "premium" to listeners who donate at least a certain amount of funds to the station or as a straight giveaway to stimulate listenership. Identificaion of the prize and the donor is permitted.

When such prize giveaways are in any way connected with a free public service announcement for other than a non-profit entity's event (such as the giveaway of tickets or albums with an upcoming concert), be sure to keep the prize giveaway separated from the related PSA to avoid the impression that the PSA was aired in return for the donation of the tickets or records—or meal or whatever. If the event announcement is on behalf of a non-profit entity, no restriction of that kind applies, but it is probably good practice in any case.

When doing the giveaway, it's OK to identify the prize and the donor, but don't pomote an other-than-non-profit event at the same time. For example, it would be OK to say something like:

"We's got a pair of tickets to the Bon Jovi concert this Friday night . . . furnished by the Bijou Theater in Vails Gate. We'll give them away to the 10th caller at 565-6710."

If you're running a bulletin board listing for concerts in the area, including that one, however, you should make sure to put some time distance between the bulletin board announcement and the ticket giveaway.

At our stations, the usual kind of giveaways involve records (from record companies, distributors, or local stores), tickets (for concerts, movies, sports events, etc.), meals/food items (from restaurants, clubs, fast-food chains, etc.). With all of these, you can describe the prize and mention the donor's name, location, and product line in value-neutral, generic terms, and include brand or trade names if they help to identify the donor and or prize. But other than identifying the prize, don't include qualitative, comparative or promotional terms in identifying the donor's product lines.

Fundraising For Others

Stations may, through routine public service announcements, or announcements aired in return for consideration, help to raise funds for other non-profit organizations, such as the Red Cross, United Way, Save the Children, etc. However, noncommercial educational stations are *prohibited* from fundraising for organizations and entities *other than the station itself* through "activities which significantly alter a station's normal programming, including auctions, marathons, membership drives, etc. . . ."

Some stations have been known to conduct fundraising marathons for local non-profit groups or charitable organizations even though this was technically prohibited under FCC policy. With the 1981 *Second Report and Order* and again with the 1982 *Memorandum Opinion and Order,* the Commission has related its policy, clearly spelling out the restrictions.

Under special circumstances, stations may apply for a waiver of the rules to permit fundraising marathons or other activities for an "outside" non-profit group. For example, the FCC granted such a waiver to a noncommercial station in Washington, DC to conduct a 3 hour fundraising program to benefit the Wolf Trap Foundation whose performing arts facilities had been destroyed in a fire. Each case is handled on its own merits, and stations should make any such waiver requests well in advance of any planned event, with no assurances the waiver request will be granted by the FCC.

Again, IBS strongly urges a reading of the complete text of the FCC's materials, including the March 1984 *Memorandum Opinion and Order* for the FCC's attitudes and thoughts on each of the issues described in this article. You may also wish to consult with a communications attorney.

None of these rules have any effect on existing carrier-current or cable stations since their operations do not come under the same FCC rules as those for non-commercial educational FM stations. However, they should be taken into account by such stations who are planning to apply for a noncommercial educational FM stations construction permit and also by those staff members who may eventually work at a noncommercial educational FM station.•

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FCC Proposes To Eliminate Call-Letter Restrictions

The FCC has proposed to eliminate a number of present restrictions related to the assignment of broadcast station call-letters. Their proposed changes would allow the use of "W" or "K" call-letters within the U.S. without a geographical restriction. They would also make it possible for assignment of the same basic call-letters to stations in different services (AM, FM or TV) even where the stations are not commonly owned. The new proposals would also streamline call-letter changes related to station ownership changes.

Under present rules, the Mississippi River has been the dividing line between the "W" and "K" call-letter assignments. Call-letters beginning with "K" can be assigned only to stations located west of the Mississippi river and those beginning with "W" can be assigned only to those located east of the river. There have already been some exceptions, mostly for older stations, including KYW in Philadelphia and KDKA in Pittsburgh. The FCC said there was no public interest justification for maintaining this geographic restriction and it had observed no problems in cases where waivers had been granted, therefore it was proposing elimination of this restriction as well as a similar restriction on call-letter assignment to low-power TV and TV translators.

The Commission also proposed allowing any station license to request any call-letters not assigned to another station in its own service. The only exception proposed that assignment of duplicate basic call-letters to another station, not commonly owned, but within the same market, would require the written consent of the licensee(s) of the other station(s) in the market already using the same basic call-letters. At present, only commonly-owned stations in the same or different markets may use the same basic call-letters.

In a move designed to streamline call-letter changes in conjunction with station ownership changes, the FCC proposed modifying their "first-come-first-served" policy to allow such changes without the risk of a licensee losing a long-established set of call-letters.

The proposed changes are a follow-up to major changes initiated by the Commission in 1983 which, among other things, shifted the resolution of call-letter disputes from the FCC to local legal forums.

At this writing, the changes are still in the proposal stage. Comments are welcomed by the FCC regarding the proposal. Mark your comments "MM

continued on page 23

Chairman's Corner

1986 was another banner year for school and college radio.

IBS, your station membership organization, was once again busy representing your interests and concerns at a number of industrywide forums. In addition, IBS responded to issues and activities that affect our stations on a national, state and local level.

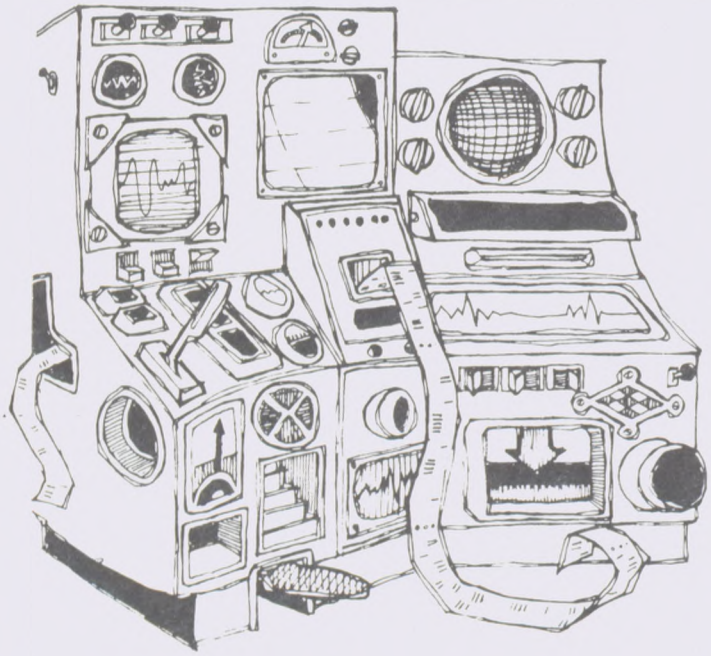
IBS staff participated as delegates and panelists at a wide variety of conferences and conventions. As our FM station membership continues to make up the largest percentage of licensed noncommercial radio outlets, your presence was made at the annual meetings of NAB, NPR and NFCB. Our carrier-current, cable and FM stations benefited from IBS attendance at music industry conclaves such as the New Music Seminar and CMJ Music Marathon.

Record companies, equipment manufacturers, programming suppliers and agency and service organizations have increased their contact with college radio to a level heretofore unheard of! We at IBS are working hard to increase and improve the working relationship between the larger communications industry and our unique brand of student radio stations. Your volunteer Board of Directors welcomes your input on any concern you may have as an IBS Station Staff member. IBS President Jeff Tellis and I are always available to take your calls and respond to your correspondence at our Vails Gate, New York office.

Here's wishing you and your station a great 1987!

Regards,

Norman Prusslin
IBS Board Chairman



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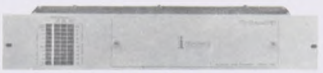

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If your station's copy of the FCC Rules & Regulations is old, years outdated or lost, you're not alone. As a service to IBS member-stations, IBS is now offering the latest government published edition of the FCC Rules and Regulations updated to October 1, 1986.

This handy paperback includes:

Part 73 - Radio Broadcast Services

Part 74 - Experimental, Auxiliary and Special Broadcast and Other Program Distributional Services

Part 76 - Cable Television Service

Part 78 - Cable Television Relay Service

It's probably the most practical and among the least expensive ways of getting a copy of the FCC Rules and Regulations which cover the establishment and operation of broadcast stations.

You'll want at least one copy for the station and personal copies for yourself and anyone else on your staff interested enough to know what the rules really say.

With each copy ordered, we'll include the IBS FCC Checklist for Noncommercial FM Stations.
It's a concise reference source for identifying the specific sections of the FCC rules covering those areas of most common interest to school and college stations and to FCC inspectors.

To order, complete the form below and send it along with your check or money order payable to IBS.

ORDER FORM - FCC RULES & REGULATIONS

Station Call-Letters: _____

Name of School/College: _____

Mailing Address: _____

City: _____ **State:** _____ **Zip Code:** _____

Please send _____ copies of the FCC Rules & Regulations, Parts 73, 74, 76, and 78 revised as of October 1, 1986 at a cost of $19.95 each, including shipping and handling for a total of $_____

A check in this amount made payable to IBS is enclosed.

A free IBS FCC Checklist for Noncommercial FM Stations is included with each copy ordered.

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Supplement your on-air schedule with one or more of these taped program series offered by IBS. Write for a complete catalog.

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13 half-hour docementaries presented by Cambridge Forum examining American culture in the nuclear age. Each program surveys a different aspect of our nuclear heritage ranging from literature and film to psychology and politics. Produced by SANE Education, 13 Tapes, IBS Members $78.00, Non-Members $104.00

The Sounds of Silence

5 half-hour programs surveying popular protest music of the 1960's and early 1970's. . . music that challenged a generation. Narrated and produced by Dr. Robert Greene, WITC-FM, 5 tapes, IBS Members $30.00, Non-Members $40.00

Symposium for the Future - President Reagan

3 college students interview President Reagan in an unrehearsed, non-partisan program recorded in September of 1985. Produced by North American Network, 1 half-hour tape, IBS Members $6.00, Non-Members $8.00

First Novel/New Novelist

A thirteen week 30-minute series focusing on first novels and new novelists for high school, college and general adult audiences. Produced by WYNE-FM under grant from the National Endowment for the Arts, 13 tapes, IBS Members $78.00, Non-Members $104.00

Send your order, including your station's call letters, school, address and check or money order in payment to IBS, Box 592, Vails Gate, NY 12584. Be sure to specify which program(s) you're ordering. If your station has produced programs which may be of interest to others, let us know and perhaps we can arrange distribution.

Engineering Miscellany

continued from page 11

five to 24 decibels, averaging 15 dB. The article includes oscilloscope photos showing hum cross-modulation, including one case of 150% peak hum modulation (at a carrier frequency of 60 kHz) caused by connecting a personal computer to the power line.

Another recent product is "The Residential Power Circuit as a Communication Medium" (J.B. O'Neal, IEEE Transactions of Consumer Electronics, Vol. CE-32, No. 3, August, 1986, pp. 567-577). This article covers surveys of line impedance, transmission-loss measurements at low radio frequencies on power distribution transformers, the rather gross effects of solid-state light dimmers as sources of radio noise, and other transmission factors. While this material, like the article previously cited, deals mainly with operation well below the 530-800 kHz band that is favored for carrier-current broadcasting, it provides useful insight and confirms a lot of hands-on experience that carrier-current broadcasters have gathered over the years. •

JCR Articles Wanted

For upcoming issues, we need articles on any and all aspects of school, college and university radio station operations and programming.

Are you doing something different at your station that might work for other stations as well? Write it up, and we'll get th word out.

Have you written a paper for a broadcast course that might be of interest? Would you enjoy seeing it receive national publication and distribution? Send it along.

While we cannot pay monetary compensation for articles used, we can provide publication along with your byline, giving you deserved recognition and a point or two for resume - building.

Topics can include:

• Music • Internships • Licensee Responsibilities • News •
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• Engineering • Programming • FCC Issues •
• Production • Record Library Systems •
or most anything else you can think of.

Send your articles to:

Editor, The Journal of College Radio
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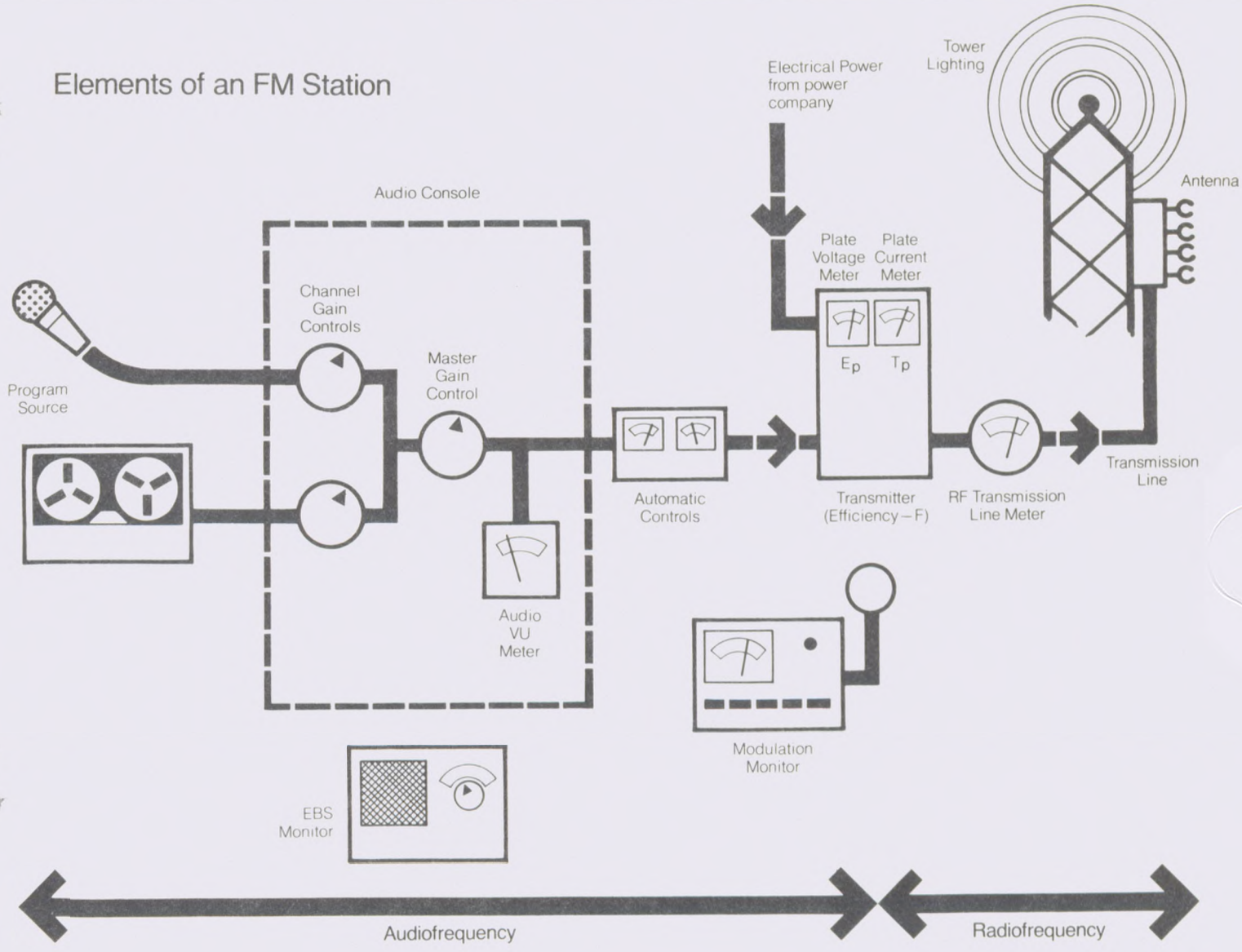
Elements of an FM Station



Obscenity

continued from page 10

policies you decide to establish for your station. We offer these as guidelines only—you must consider all the factors and circumstances in the unique setting of your station, your institution, your locality and your situation. The 3 suggested components are:

Time of Day—certain kinds of programming scheduled late-night only.

Use of Disclaimers—informal announcements aired before and perhaps during the broadcast of potentially sensitive material—alerting those who may be sensitive to such programming that it is about to be broadcast and suggesting that they might want to tune away for now and rejoin your station at a stated later time.

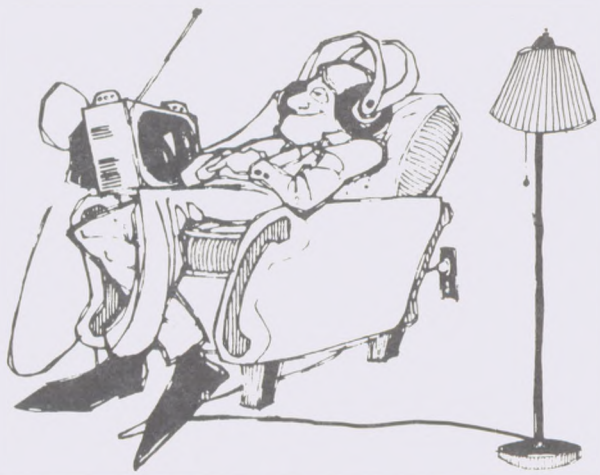
Sanctions—Violations Procedures—how are the guidelines you are establishing going to be enforced? What are the procedures and consequences resulting from various kinds of violations of these guidelines? These must be decided upon before violations may occur.

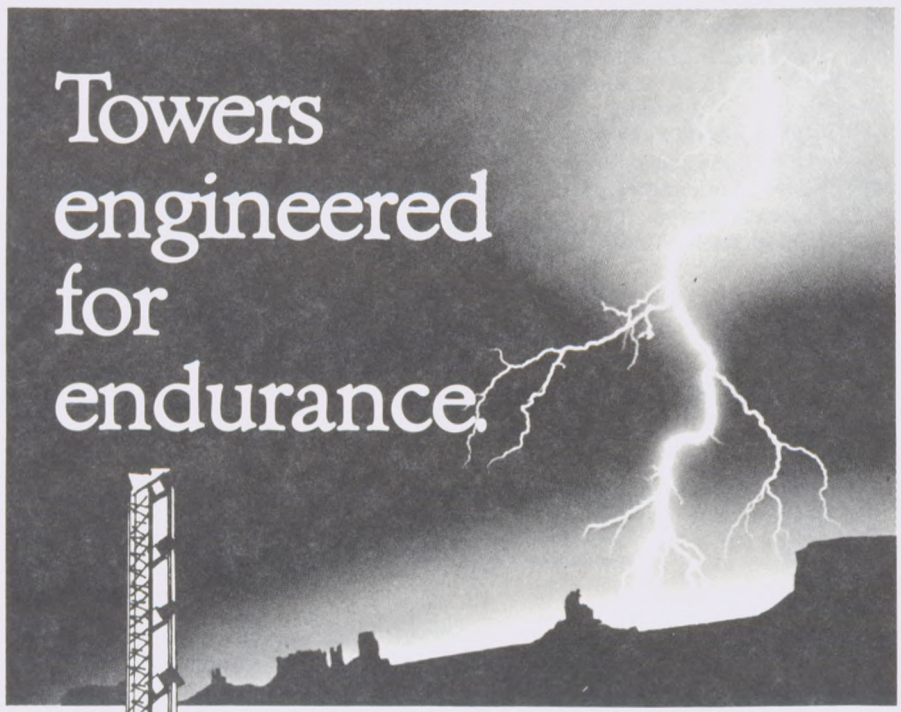
In reality, the practical limitations, if any, on your programming probably have more to do with your station's licensee (the Board of Trustees) than with the FCC. Should any incident occur, how willing will they be to defend the station? Will they actively support you? Or, will they instead simply give up—by turning in the station's license, kicking out the student staff, turning the station into an NPR classical music outlet? A lot may be dependent on the record of responsibility you have established and the policies and procedures you have developed to avoid these kinds of problems and to deal with them should they happen.

Once you've established your written guidelines and policies, make sure people know about them. Distribute copies to every member of your station staff, to all new staff members when they join, to your Faculty Advisor, and (with an appropriate cover letter) to a representative of your licensee.

If we can be of any assistance to you in your efforts with these matters, please feel free to get in touch with:

John Murphy, General Manger -
WHUS Radio
Box U-8R, 2110 Hillside Road,
Storrs, CT 06268
(203) 486-4007 or 429-WHUS
or
Jeff Tellis, President -
Intercollegiate Broadcasting
System (IBS)
Box 592 - Vails Gate, NY 12584
(914) 565-6710





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- **GaAsFET front end.** Provides the highest achievable sensitivity for maximum system range. Also incorporates a high-performance helical filter.
- **Lowest distortion.** 0.25% maximum, 0.15% typical.
- **Measurably the highest signal-to-noise ratio and widest dynamic range.** Quiet as a wire. With DYNEX II (a new standard in audio processing), SNR is 101 dB (108 dB A-weighted). System dynamic range is 133 dB including transmitter adjustment range, from input for maximum nondistorting gain compression to noise floor.
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- **True dual-receiver diversity.** The R-42 diversity system is the most reliable method to avoid dropouts. The R-41 nondiversity receiver has all of the other features of the R-42.

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Write or call for further information and location of your nearest dealer: Cetec Vega, P.O. Box 5348, El Monte, CA 91734. (818) 442-0782.

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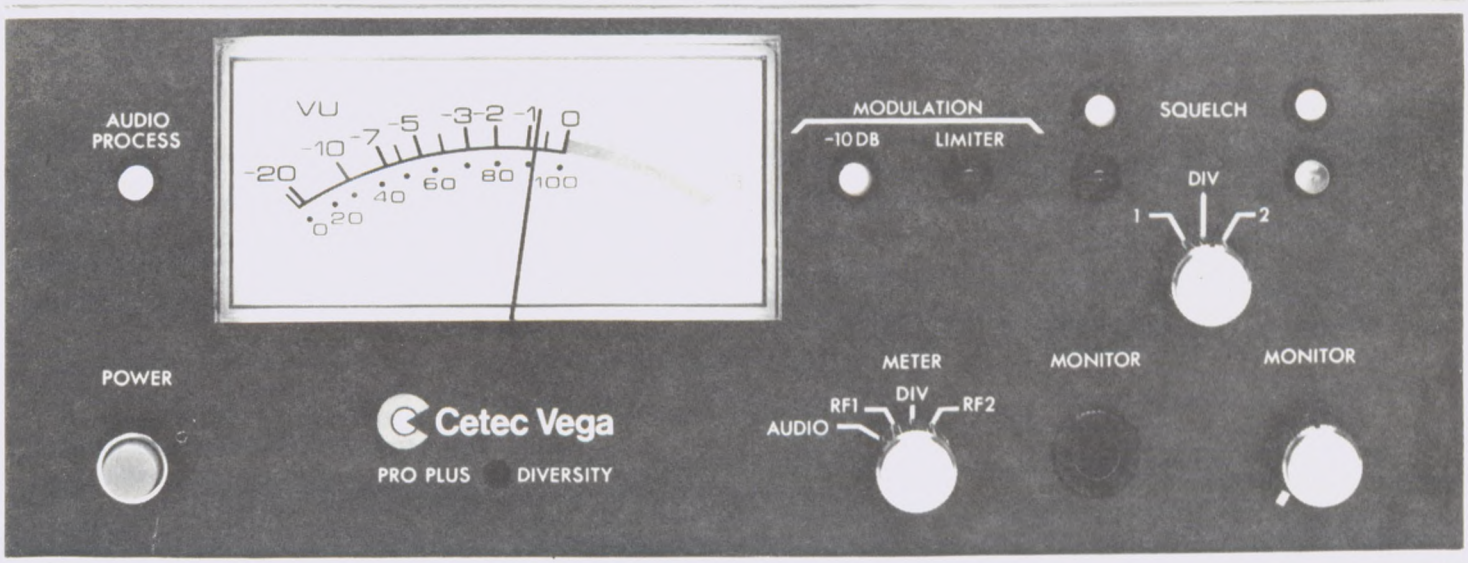


Cetec Vega

...the professional's wireless

Training Programs

continued from page 12

is vital to dealing effectively with turnover related problems.Don't wait until you need people to begin - plan ahead for long-term continuity.

Don't let your training program fall victim to turnover! make sure you have a select group of training personnel working together. A system which does not depend on one person exclusively will survive when he or she leaves and is less apt to be abused.

A Word on Emotional Burnout

I have been doing workshops on radio training and its importance for several years now and I have seen many station staffs try to sort out many problems. Eventually, many realize that the cause of a great deal of turnmoil was a lack of investment in the proper training of new staff. Bad habits or attitudes that should have been nipped in the bud were never caught or dealt with, and we all know how hard it is to teach new tricks to an old announcer! When you try to rectify this after the fact, it is likely you will lose announcer-programmers and burn out your program directors. On the other hand, you may end up with a dictator-style manager who loves to push people around. Either way the station loses potentially good people.

Components of Effective Training Programs

Any useful program should include information in the areas listed below. Article reprints and written materials should be used to supplement any presentations by training personnel. "The FCC Operator Handbook" is a useful text to use, featuring a good summary of many radio basics. While the FCC data is likely to be the same for most of you, the other areas will have to be customized to your particular stations needs and resources.

LEGAL
1. FCC rules and regulations
2. Station policies, constitution
3. Require all trainees to pass written exams

TECHNICAL
1. Transmitter operation
2. Studio equipment
3. Production techniques
4. Troubleshooting problems

AESTHETIC
1. Programming methods format rules
2. Music policies
3. Consideration for the listener and the community
4. Announcing technique, style

INDISTRY PERSPECTIVE
1. Status of deregulation of the media
2. Current trends in ownership and control
3. Current trends in programming
4. Bring in guests from area stations
5. Employment prospects - how to prepare for a career and search for jobs

Methods of Implementation

There is no one formula for training. There are a variety of approaches, depending largely on the size of your station and how it is operated. A few general models have evolved over a number of years.

The training models I have seen and worked with fall into three basic categories:
1. Highly structured classes with separate studio labs
2. Less formal workshops combining classes and labs
3. The individual one-on-one approach

Choose the training model most appropriate for your station. This is critical to the success of your efforts. Your selection should take into account your existing resources and needs. As your station grows or as your circumstances change, you may need to modify training methods. Be consistent and uniform with whatever model you use for training, but don't "set it in cement" or be afraid to change it in the future.

The following outline shows the four component areas identified earlier and suggests how each might be applied to the operation of the three basic station models - large, medium and small.

LARGE STATIONS
1. Legal.
   a) Use classes or workshops
   b) Require written exams for clearance
2. Technical
   a) Use small labs for initial instruction
   b) Use one-on-one for clearance
3. Aesthetic
   a) Use classes or workshops
   b) Supplement with text, articles, written handouts
4. Industry Perspective
   a) Bring in guests to meet trainees
   b) Supplement with written materials

MEDIUM SIZED STATIONS
1. Legal
   a) Use workshops and written materials
   b) require written exams for clearance
2. Technical
   a) Use small groups for initial training
   b) Use one-on-one for clearance
3. Aesthetic
   a) Use workshop meetings and articles
4. Industry Perspective
   a) Use guests and articles

SMALL SIZED STATIONS
1. Legal
   a) Use written materials only
   b) Use individual meetings to answer questions
   c) Require written exams for clearance
2. Technical
   a) Use one-on-one
3. Aesthetic
   a)Use meetings and written materials
4. Industry Perspective
   a) Use guests and articles

Additional Information and resources

Legal

1. "The FCC Operator Handbook" - Prepared by the FCC. The latest edition was printed in 1976, prior to much of the deregulation. While many of the rules have changed, the chapters on general radio theory and practice are still useful for training applications. Just be sure to include the most recent FCC rules available. The book is available from the Superintendent of Documents in Washington DC and from the US Government Bookstore in your local region. It costs about $6.00 and quantity discounts are available for educational purposes.

2. "Law of Mass Communications - Freedom and Control of Print and Broadcast Media" - written by Harold Nelson and Dwight Teeter. Published by the Foundation Press, New York. This book reviews legal aspects of libel, slander, copyright, contempt, obscenity, public access to mass media, antitrust law and the regulation of advertising. Used often as a college text.

3. "Documents of American Broadcasting" - Edited by Frank Kahn. Published by Prentice-Hall, New Jersey. A valuable compendium of the history of media-related law and policy. Areas reveiwed include the history of broadcast regulation, the freedom of expression, the regulation of competition, educational broadcasting and the public interest. Actual texts are included from Acts of Congress, presidential documents, key juidicial decisions and addresses by significant figures (such as Edward R. Murrow, Newton Minnow and the rest of the gang).

4. "The Invisible Resource - Use and Regulation of the Spectrum" - written by Harvey Levin. Published by Johns Hopkins Press, Baltimore. Sponsored by Resources for the Future. A description and analysis of the economic characteristics of the radio spectrum. It

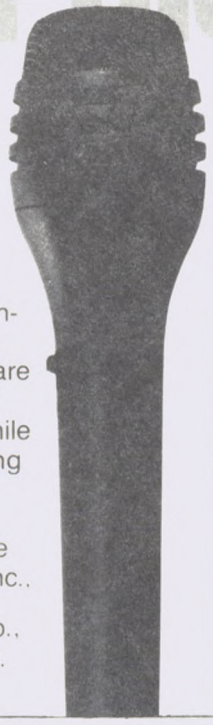
continued next page

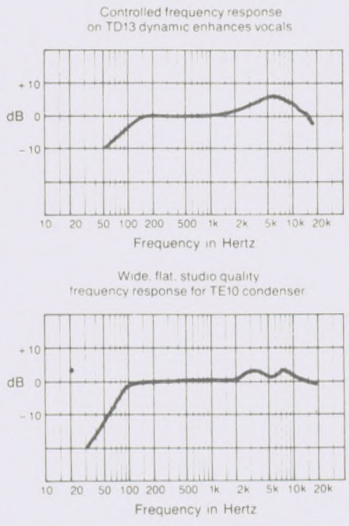
Performance impressive enough to change a sound pro's old habits.

SURPRISING!

Telex TE10 and TD13 sound reinforcement mics are making believers out of sound pros who have been automatically specifying the same microphone for years. These new low mass design condensers (TE10) and high output dynamics (TD13) are meeting the demands of even the toughest pros while at the same time providing unexpected savings. Surprise yourself. For detailed information write Telex Communications, Inc.,

9600 Aldrich Avenue So., Minneapolis, MN 55420.




Controlled frequency response on TD13 dynamic enhances vocals
+10
dB 0
-10
10 20 50 100 200 500 1k 2k 5k 10k 20k
Frequency in Hertz

Wide, flat, studio quality frequency response for TE10 condenser
+10
dB 0
-10
10 20 50 100 200 500 1k 2k 5k 10k 20k
Frequency in Hertz

TELEX

TELEX COMMUNICATIONS, INC.

Training Program

continued

provides a detailed account of the workings of the communications system as they relate to spectrum use.

Technical

Listed are two excellent sources of technical information. While there are many books written for the advanced audio engineer, there are relatively few available for people just getting started. These two are especially useful because they are focused on the perspective and concerns of the beginning producer. As such, I have found them ideal for use in training programs at radio stations (No, I do not receive any revenue from their sale!)

1. "Audio Craft" - written by Randy Thom. Available only from NFCB (The National Federation of Community Broadcasters), 1314 14th Street, N.W., Washington, DC 20005, Phone (202) 797-8911. Cost is $10-15. Quantity discounts are available.

2. "The Technique of the Sound Studio" - written by Alec Nisbett. Published by Hastings House, New York City. Costs around $10 and is available commercially through local bookstores. Be sure to get the most recent edition!

More Writings For the Serious Seeker

Below are several books which provide additional information on media history, "the industry", and aesthetic/artistic concerns.

1. "A History of Broadcasting in the United States" - the legendary three-volume work. Written by Erik Barnouw. Published by Oxford University Press, New York.

2. "Reluctant Regulators: The FCC and the Broadcast Audience" - written by Barry Cole and Mal Oettinger. Published by Addison-Wesley, Reading, MA.

3. "This Business of Radio Programming" - written by Claude and Barbara Hall. Billboard Publications, New York. It covers promotion, research, formats, payola, the relationship between the disc jockey and management, salaries and even how to get a job. Includes revealing interviews with Bill Drake, Don Imus, Chuck Blore, Robert W. Morgan and others.

4. "Broadcasting in America: A survey of Television and Radio" - written by Sydney Head, Houghton Mifflin Co., Boston. A serious college text. Look for the most recent edition.

5. Anything by Marshall McLuhan, the controversial 60's media visionary. Some "experts" thought he missed the boat; others jumped aboard. He brought new insights which revolutionized our perceptions of the media and sparked many healthy discussions. A good starting point might be "Understanding Media: The Extension of Man", McGraw Hill, NY.

6. "The Responsive Chord" - written by Tony Schwartz. Anchor Press, New York. Applications of McLuhan to media production and marketing. Discusses the strategy behind how to reach someone via the media by invoking an interal response process.

7. "Sex and Broadcasting: A Handbook for Starting a Radio Station for the Community" - written by Lorenzo Milam. Dildo Press, Dallas. This is *The Book* for many community radio people, or anyone into the medium for more than just money. Loaded with advice and inspiration, you won't find this one on the coffee tables at the NAB. Unfortunately it is out-of-print, so copies are hard to find. Check in used book stores or contact people at your local noncommercial stations.This is a treasure that is often passed around and shared among kindred spirits.

A Final Note

I am continuing my research on training programs and I would like to ask anyone reading this to consider sharing your model and allowing me to include your station in the data-base for analysis. If you can, please send any relevant information or inquires to me at WHUS Radio, Box U-8R, Storrs, CT 06268. Phone (203) 486-4007 (Offices) or 429-WHUS (Studios). The result will be published in a future issue of The Journal of College Redio.

Please feel free to contact me at WHUS if I can be of any assistance to you in your efforts. I have committed my personal and professional energies to help keep noncommercial radio alive and kicking, and I enjoy sharing the spirit whenever the opportunity arises. •

FCC Proposal *continued from pg15*

Docket 87-11" and address them to: Secretary, FCC, 1919 M St. N.W., Washington, DC 20554.

Comment filing deadline is April 17. For further information contact Sharon Briley at the FCC, (202) 632-6302.

Carrier-current stations are not directly affected by the new proposals. They generally operate as nonlicensed, low-power devices governed by the mostly technical provisions of Part 15 of the FCC's rules. Under Section 73.3550 (m), these stations "may use whatever identification is currently desired, so long as propriety is observed and no confusion results with a station for which the FCC issues a license".

View on Fund Raising. .

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third year, the national econo-my was in a turmoil and the presi-dential elections were imminent: merchants were uncertain as to their future and were unwilling to take any chances so the amount of donated merchandise was terribly sparse.

The "Radiothon" is held on a week-end, from Firday at noon to Sunday at midnight (56 hours). The executive offices at the station are transformed into "mission control", with tele-phones, the auction board, and a mixer/microphone for the auction-eer. At any given time, there is a need for five staff members; two to answer the phones, the person to coordinate the merchandise up for auction, the announcer on the air, and the auctioneer. The auctioneer describes the items up for bid - their use, physical appearance, and who made the donation; he tells the current dollar bid on each item; and en-courages bidding by reminding the listener of the telephone numbers and the goals of the "Radiothon".

There are six items up for bid all the time, and they are changed hourly. The merchandise is chos-en so that there are no like items on the auction board at the same time (one of the most popular donated items are certificates for haircuts from any of the shops in our town). Big ticket items such as a stereo receiver or a pass for two for an academic session to a popular night spot are made avail-able for bid throughout the week-end. Some of the largest dollar pledges have been 'made by listeners bidding for the oppor-tunity of "guest announcing" on their favorite program.

So the "Radiothon" ends and the remaining task is to collect the pledges. Within a week the listen-er will receive a phone call verifying that they were the high bidder on an item, and asking them to come in soon to make their do-nation and receive their merchan-dise. It has taken approximately one month to collect 60% to 70% of the pledges.

A well planned fund raising cam-paign can have multi-faceted effects on those involved. The listener is satisfied by partici-pating in a public medium that appears to know how to handle contributions. The volunteer staff takes pride in involvement with a well-supported organization. The volunteer management have their leadership/organizational abilities reinforced. And the station's financial worries can be forgotten for a while. •

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